City of Seattle
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Department of Planning and Development
D. M. Sugimura, Director

CITY OF SEATTLE
ANALYSIS AND RECOMMENDATION OF THE DIRECTOR OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT TO THE SUPERINTENDENT OF SEATTLE CITY LIGHT UTILITY

Application Number: 3021270

Applicant Name: Tanya Friese for CrownCastle

Address of Proposal: 3308 P W Howe Street

SUMMARY OF PROPOSED ACTION

Land Use Application to locate a minor communication utility (CrownCastle) on a replaced Seattle City Light utility pole #1384480 in the right-of-way. The project includes replacing the existing pole with a 34' high light pole and attaching two antennas to the new pole. Final decision on placement of antennas will be made by Seattle City. Equipment to be mounted on the pole.

The following approval is required:

Administrative Conditional Use – Class II Attachment Siting, Review and Recommendation to Superintendent of Seattle City Light – SMC 15.32.300C4b

BACKGROUND INFORMATION

Site and Vicinity Description

The proposal site is a Seattle City Light utility pole. The utility pole is located on north side of West Howe Street right-of-way situated between the curb and sidewalk. West Howe Street is an improved street with curbs, sidewalks and gutters. There are tall mature trees and shrubs characteristic of typical landscape of the surrounding vegetation.

The area is zoned Single Family 5000 (SF 5000). Surrounding properties and blocks are also zoned Single Family 7200. Development in the area consists of a variety of one and two-story single-family houses, buildings of varying age and architectural style on a variety of lot sizes, consistent with the zoning designation.

Proposal Description

CrownCastle Wireless proposes to install a minor communication utility facility consisting of 2 panel (2-sector) antennas to be mounted within a 3'-6" high shroud atop a 34' pole for a total height of 35'8". The proposed new 34' utility pole will replace the existing 32'2" high pole in the same location in W Howe Street right-of-way. The connecting cables to the antennas will be shrink wrapped on the pole as well as the cabinet equipment which is also mounted on the pole.

ANALYSIS - SITING RECOMMENDATION TO SUPERINTENDENT OF SEATTLE CITY LIGHT

The Street and Sidewalk Use Chapter of the Seattle Municipal Code allows Class II Special Attachments (minor communication utilities) to be placed on utility poles owned by Seattle City Light that are located on public rights of way. Class II Special Attachments are specifically regulated by SMC Section 15.32.300. This Section allows for minor communication utilities, or other Class II Special Attachments, to extend above the electrical facilities (wires) on top of an existing pole, or the replacement of an existing pole to achieve adequate height for the applicant's purposes. Section 15.32.300 further requires that all costs of such replacements be borne by the communications provider, and that the visual impacts of minor communication utilities and other Class II Special Attachments shall be reduced to a degree acceptable to the Superintendent of City Light.

Where a request for Class II attachment is made, and the proposed location is on an arterial street located within a Single Family Zone, the applicant shall apply to DPD and pay for an attachment siting review and recommendation consistent with the application, fee, notice, timeline and criteria for an Administrative Conditional Use (ACU) permit. The DPD recommendation shall be advisory to the Superintendent of City Light. The specific ACU criteria can be found in SMC Section 23.57.010, subsection C2. The criteria, which must be satisfied in order for the proposal to receive a positive recommendation from DPD, are as follows:

a. *The proposal shall not be significantly detrimental to the residential character of the surrounding residentially zoned area, and the facility and the location proposed shall be the least intrusive facility at the least intrusive location consistent with effectively providing service. In considering detrimental impacts and the degree of intrusiveness, the impacts considered shall include but not be limited to visual, noise, compatibility with uses allowed in the zone, traffic, and the displacement of residential dwelling units.*

As previously mentioned in the proposal description section, the entire proposal also includes a wood utility pole to be located in the W Howe street right-of-way within the Single Family 5000 (SF 5000) residential zone. The height of the utility pole, including the antennas, would be 35'8". This new wood utility pole would replace an existing 32'2" Seattle City Light (SCL) utility pole. The antennas would be mounted within a shroud and painted to match the color of the proposed wood pole. All conduits (cables) would be shrink wrapped on the pole connected to the cabinet equipment that is mounted on the pole.

Certain aspects of this proposal-such as the associated mechanical equipment located within an equipment and the conduit concealed within the utility pole and buried underground-would not be detrimental to the residential character of the surrounding neighborhood. Therefore, the

proposed 35'-8" utility pole and the cellular antennas would not be detrimental to the visual character of the surrounding single family neighborhood. An appearance comparison chart and reasons why are noted below:

Appearance	**Existing SCL Utility Pole**	**Proposed SCL Utility Pole**
Shape	Cylinder-like shape	Prism-like shape
Color	Natural brown wood	Artificial brown wood
Width	Varies per Seattle City Light	30' wide with a 3'6'2' diameter shroud atop with a chase and brackets affixed to the pole
Height	32'2"	34" pole with a 3'-6" shroud atop (overall height equals 35'-8")
Material	Solid wood	Wood
Equipment Atop of Pole	None	2 antennas within a shroud

1. Although the proposed SCL utility pole with the antenna and shroud would *be* taller (35' 8") than the existing SCL utility pole the height is lower than a typical 60' tall utility pole.

2. The proposed utility pole design has both a shape and overall bulk that is not larger than that of a typical round wood utility pole.

3. The proposed antennas and the antenna shroud are atypical of other equipment, including transformers, located in single family zoned public rights-of-way. Specifically, the size and location of the shielded antennas would make them highly visible. This is largely due to the fact that the proposed antenna would be located above the existing utility lines 3 ft.6 inches taller than the existing utility pole. However, no portions of the antenna shield are proposed to project beyond the shape of the pole.

As proposed, the minor communications utility will not constitute a visual intrusion that conflicts with the existing residential character of the surrounding neighborhood because the antenna in the shroud enclosure is mounted on top of the new utility pole. The accessory cabinet looks like a typical city light transformer. Painting the antennas exterior brown and accessories is adequate to minimize the visual impacts for this proposal. The site location adjacent the parks with tall mature over grown tress provide nature cover and concealment to the antenna. Therefore, the proposed minor communication utility would not be visually obtrusive and would, therefore, will not be detrimental to the residential streetscape and character of this neighborhood**.**

In addition, the applicant has provided a strong case that the proposed design and this particular location is the least intrusive location consistent with effectively providing service, whether in the public right of way or on private property. The applicant states that CrownCastle RF engineers have determined a need for additional coverage in this area. A "before" plot coverage map submitted by the applicant, indicates that the existing coverage at this location and the surrounding area is poor. They have prepared a preliminary design analysis that takes into

account a series of variables such as terrain data, antenna height, population density, available radio frequencies and wireless equipment characteristics. The engineers have noted the need for the utility to be at the proposed height if sited in this location. Although, the entire search ring appears to be zoned single family and the carrier feels that locating antennas atop of a Seattle City utility pole is a better alternative than constructing a new monopole.

Based on the Geocortex research conducted by the Land Use Planner, there were no commercial structures nearby on W Howe Street blocks of the chosen site. That would have been recommended as an alternative site.

b. ***The visual impacts that are addressed in Section 23.57.016 shall be mitigated to the greatest extent practicable.***

The only provision contained with SMC Section 23.57.016 that applies to the proposal is subsection J. However, even that subsection applies to freestanding transmission towers. Technically, utility poles are not freestanding transmission towers. However, the similarities of the two warrant consideration of subsection J, which reads as follows:

> *Freestanding transmission towers shall minimize external projections from the support structure to reduce visual impacts and to the extent feasible shall integrate antennas in a screening structure with the same dimensions as external dimensions of the support structure, or shall mount antennas with as little projection from the structure as feasible. External conduits, climbing structures, fittings, and other projections from the external face of the support structure shall be minimized to the extent feasible.*

The applicant has attempted to demonstrate compliance with Section 23.57.016 by proposing the installation of a wood pole. The wood pole is designed to conceal electrical cable conduits to run through it. The area of the wood pole is approximately 18" X 20". The applicant has also proposed to paint the utility pole and the antennas the same color in an attempt to conceal the proposed minor communication utility in a shroud. The antenna and screening is proposed to have a rectangular shape with a diameter somewhat larger than the width of the rectangular pole. This design does integrate the antenna with the pole; therefore, the proposed design accomplishes this to the fullest extent feasible.

c. Within a Major Institution Overlay District, a Major Institution may locate a minor communication utility or an accessory communication device, either of which may be larger than permitted by the underlying zone, when:

> *i. the antenna is at least one hundred feet (100') from a MIO boundary; and*
> *ii. the antenna is substantially screened from the surrounding neighborhood's view.*

The proposed site is not located within a Major Institution Overlay; therefore, this provision is not applicable.

d. If the minor communication utility is proposed to exceed the permitted height of the zone, the applicant shall demonstrate the following: (i) The requested height is the minimum necessary for the effective functioning of the minor communication utility, and (ii) Construction of a network of minor communication utilities that consists of a greater number of smaller less obtrusive utilities is not technically feasible.

The proposed antennas will be on a laminated wood utility pole that is proposed to be 35'-8" height and exceeds the 30' height limit of the SF 5000 zone. The height of the existing SCL pole is 32'2" with the power line at 30'7".

According to the applicant, the specific location of the proposed site has been selected to maximize capacity and coverage/penetration while minimizing the antenna height requirement. Significant deviation from this location will result in reduced effectiveness and possible invalidation of the proposed site altogether. In regards to the antenna height, the specified centerline is the minimum acceptable to provide the needed coverage with respect to that from neighboring cell sites. Lowering the antenna height would result in reduced effectiveness. In the applicant's opinion, strict application of the standards would preclude the applicant from providing wireless services for the intended coverage area.

Due to SCL clearance and separation requirements, it does appear that the applicant is attempting to request a height that is the minimum necessary for the effective functioning of the minor utility for this particular location. But, the applicant does not provide evidence as to why a greater number of smaller less obtrusive facilities on commercial properties in and near the designated search ring and nearby neighborhood commercial and lowrise zones are not technically feasible meet CrownCastle service objectives.

e. If the proposed minor communication utility is proposed to be a new freestanding transmission tower, the applicant shall demonstrate that it is not technically feasible for the proposed facility to be on another existing transmission tower or on an existing building in a manner that meets the applicable development standards. The location of a facility on a building on an alternative site or sites, including construction of a network that consists of a greater number of smaller less obtrusive utilities, shall be considered.

Although, the proposed SCL utility pole with antennas is not by definition a new freestanding transmission tower, the applicant has demonstrated that it is not technically feasible for the proposed facility to be sited on another utility pole since there is no nearby commercial corridor along W Howe Street in a manner that meets the applicable development standards.

SITING RECOMMENDATION TO SUPERINTENDENT OF SEATTLE CITY LIGHT

Based on the above analysis the Director of the Department of Development and Planning recommends to the Superintendent of Seattle City Light to **Conditionally Approve** the application to install a minor communication utility on Seattle City Light pole in the public right-of-way in a residential zone.

Recommended Condition
For the Life of the Permit

1. Paint to match the color of the pole.

Signature: *Betty Galarosa for* Date: August 27, 2015
Onum Esonu, Land Use Planner
Department of Planning and Development

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